Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Spectrum Needs of Emergency	)	FCC 05-80
Response Providers	)	WT Docket 05-157
	)	

COMMENTS OF
REGION 12 700 MHz REGIONAL PLANNING COMMITTEE

The Region 12 (Idaho) 700 MHz Regional Planning Committee (RPC) is in the final stages of preparing the statewide plan for submittal to the FCC. In addition, my agency is in the process of the purchase and installation of a 700 MHz trunked simulcast radio system that will be used by all emergency responders in Ada County, Idaho. Ada County encompasses the city of Boise, Idaho's capital, and is home to nearly 24% of the entire state's population.

As we move forward with our project we have been reviewing and discussing the frequency allocation set out in the Computer Assisted Pre-Coordination Resource and Database System (CAPRAD) plan as outlined by the University of Denver Research Institute (http://caprad.nlectc.du.edu/cp/index.jsp). This frequency plan was designed to prevent interference within individual regions and along their border regions, and is being adopted by the Region 12 RPC and our surrounding regions in the planning process.

In the CAPRAD plan Ada County was allocated 19 General Use 25 KHz-wide channels. Subsequent conversations with the engineers designing our system indicate we will be required to obtain two frequencies outside Ada County's allotment even though our system is an 18-channel system using 12.5 KHz wide channels. This is due to the amount of spread between adjacent channels in the 12.5 KHz allocation. Keep in mind this is only for the trunked

simulcast system. The allocation of frequencies for simplex channel use is still under discussion.

Consider this as a real life example of the need for additional spectrum. It's true that some counties in Idaho may not use the 700 MHz band for communications, nor would they use their entire allotment if they chose to operate in that band. However, in more populous regions in the country I believe you will see public safety agencies running out of spectrum under the current spectrum allotment.

Our agency took a serious look at the usual VHF and UHF bands as we studied the needs of our future interoperable system and found that the specific frequencies needed for a trunked system were impossible to obtain here. Our current system, a consolidated VHF/UHF conventional simulcast system, suffers from repeated RF interference as a result of the rising noise floor in those bands. We opted for 700 MHz as a result of it being clean spectrum that we could use immediately, and the possibility of gaining additional spectrum in the future.

Boise is home to Boise State University, the state's largest university. Many large regional, national and international companies are headquartered here including Hewlett-Packard, Micron Technology, Simplot Corporation, Boise Cascade and Albertsons. Boise was just identified as the third largest city in the northwest, trailing only Seattle, Washington, and Portland, Oregon. Boise is also recognized as one of the fastest growing communities in the country.

As you can see, our spectrum needs will only increase over time. If we are having difficulty filling those needs today with our current allotment we will continue to struggle as we move forward. Our community is not so unique in this respect. There are undoubtedly many more across the nation that will face the same issues when assessing their spectrum needs.

To address the question of using commercial radio resources, I submit that time and again we see commercial wireless technologies rendered inoperable during critical events, just at a time when we would need those most. We saw this in New York City during the events on 9/11, and prior to that during the Oklahoma City bombing. In the case of the Oklahoma City bombing it occurred without any physical damage to telephone or cellular switches, but rather was a result of massive system overload. The most recent example occurred as a result of hurricanes in Florida. Commercial systems failed, and in some cases for many weeks. Though I would never rule out using every available resource during such catastrophic events, I will always rely first on a dedicated public safety network as my primary communications foundation given that they are designed with the resources and redundancy necessary to survive such events.

I applaud the efforts of the federal agencies involved in the investigation of the spectrum needs of the public safety community. It would take more time than allowed during this public comment period to complete a comprehensive study of our future spectrum needs and make recommendations as to which part of the spectrum, and how much should be allocated. But, we will continue to study our needs and those of our community and will share our findings with any interested parties. We will also continue to work closely with our state's SIEC as they more accurately define the needs for the entire state of Idaho.

Respectfully submitted,

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Chair Region 12 (Idaho), 700 MHz Regional Planning

April 28, 2005